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Defendant Methodist Le Bonheur Healthcare (“Methodist”), in response and opposition to Plaintiff’s Request for Entry of Default (ECF No. 58), states that Plaintiff’s Request fails to make the requisite showing for default judgment under Fed. R. Civ. P. 55 and is legally improper and deficient in all respects.

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Corporation, Baptist Memorial Health Care, and The West Clinic (ECF Nos. 61, 62, 63), Plaintiff's Request is a legal nullity and should be denied and disregarded for purposes of computing the time frame for this judgment becoming a final judgment.

Respectfully submitted,

s/Buckner Wellford

Buckner Wellford (#9687 – Admitted PHV)

Jerrick Murrell (PHV Motion to be filed)

BAKER, DONELSON, BEARMAN, CALDWELL
& BERKOWITZ, P.C.

165 Madison Avenue, Suite 2000

Memphis, Tennessee 38103

(901) 526-2000

bwellford@bakerdonelson.com

jmurrell@bakerdonelson.com

Brigid M. Carpenter (#18134)

BAKER, DONELSON, BEARMAN, CALDWELL
& BERKOWITZ, P.C.

1600 West End Avenue, Suite 2000

Nashville, Tennessee 37203

(615) 726-7341

bcarpenter@bakerdonelson.com

*Attorneys for Defendant Methodist Le
Bonheur Healthcare*

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of August, 2024, a true and exact copy of the forgoing document was served on all counsel of record via the Court's electronic filing system.

Heather Cairns Ross
Tennessee Attorney General's Office
P O Box 20207
Nashville, TN 37202-0207
Email: heather.ross@ag.tn.gov

Joel E. Tragesser
Quarles & Brady (IN Office) 135
N Pennsylvania Street Suite 2400
Indianapolis, IN 46204
Email: joel.tragesser@quarles.com

Chad M. Jackson
Morgan & Akins, PLLC
10 Burton Hills Blvd.
Suite 210
P O Box 158657
Nashville, TN 37215
Email: cjackson@morganakins.com

Emily H. Huseth
Harris / Shelton
6060 Primacy Parkway
Suite 100
Memphis, TN 38119
Email: ehuseth@harrishshelton.com

John-David H. Thomas
Mackenzie Hobbs
Barnes & Thornburg LLP
1600 West End Avenue, Suite 800
Nashville, TN 37203
jd.thomas@btlaw.com
mackenzie.hobbs@btlaw.com

I also hereby certify that a true and exact copy of the forgoing document was served via U.S. Mail on the following individuals:

Randel Page
13535 Cathy Road
Byhalia, MS 38611

s/ Buckner Wellford
Buckner Wellford